

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11625-RWZ

JOAN CHARLES,
Plaintiff,

v.

OCWEN FEDERAL BANK FSB;
OCWEN FINANCIAL CORPORATION;
MASSACHUSETTS PROPERTY
INSURANCE UNDERWRITERS
ASSOCIATION; and ONE CALL
INSURANCE AGENCY, INCORPORATED,
Defendants.

RULE 26 INITIAL DISCLOSURES BY DEFENDANTS
OCWEN FEDERAL BANK FSB AND OCWEN FINANCIAL CORPORATION

Pursuant to Fed. R. Civ. P. 26(a)(1), Ocwen Federal Bank FSB and Ocwen Financial Corporation (jointly the “Defendants”) make the following initial disclosures:

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Excluding those individuals who may be used solely for purposes of impeachment, the following individuals may have discoverable information that Defendants may use to support their claims or defenses. Also listed is a general description of the subjects of the information they may possess, as well as the address and telephone numbers for each individual—to the extent known to the Defendants. The individuals identified and subjects of information enumerated are “initial,” based on information currently available. Individuals with information as well as the subjects of information may broaden or change as discovery occurs.

Accordingly, the Defendants do not limit themselves to these initial disclosures and reserve the right to supplement this response.

#	NAME/ADDRESS	SUBJECT(S) OF INFORMATION
1.	Lucrece Guy Ocwen Federal Bank FSB c/o Paul Michienzie, Esq. Michienzie & Sawin, LLC 745 Boylston Street, 5 th Floor Boston, MA 02116	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
2.	Joan Charles c/o Barry Greene, Esq. Portnoy and Greene, P.C. 197 1 st Ave., Suite 130 Needham, MA 02494	Knowledge of the real estate mortgage on the Property, insurance payments for the Property, damage to the Property, and MPIUA's decision not to insure Property.
3.	Keeper of Records One Call Insurance Agency 121B Tremont Street Suite 25 Brighton, MA 02135	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
4.	Person with Knowledge One Call Insurance Agency 121B Tremont Street Suite 25 Brighton, MA 02135	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
5.	Keeper of Records Mass. Property Ins. Underwriters Ass'n c/o Michael W. Reilly, Esq. Tommasino & Tommasino 2 Center Plaza Boston, MA 02108	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
6.	Person with Knowledge Mass. Property Ins. Underwriters Ass'n c/o Michael W. Reilly, Esq. Tommasino & Tommasino 2 Center Plaza Boston, MA 02108	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.

#	NAME/ADDRESS	SUBJECT(S) OF INFORMATION
7.	Katherine Godfrey New Century Mortgage Corp. 18400 Von Karman Ave., Suite 1000 Irvine, CA 92612 T: (949) 250-5199	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
8.	Lorraine Harrop New Century Mortgage Corp. 18400 Von Karman Ave., Suite 1000 Irvine, CA 92612 T: (949) 250-5199	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
9.	Larry Laskey New Century Mortgage Corp. 18400 Von Karman Ave., Suite 1000 Irvine, CA 92612 T: (949) 250-5199	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
10.	Keeper of the Records New Century Mortgage Corp. 18400 Von Karman Ave., Suite 1000 Irvine, CA 92612 T: (949) 250-5199	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
11.	Gary Marinosci Liberty Title and Escrow Co. 385 South Main Street Providence, RI 02903 T: (401) 751-8090	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
12.	Keeper of Records Liberty Title and Escrow Co. 385 South Main Street Providence, RI 02903 T: (401) 751-8090	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
13.	Kathleen A. Lewis SR Member Services Representative Medical Area Federal Credit Union 221 Longwood Ave. Boston, MA 02115 T: (617) 732-4185	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.

#	NAME/ADDRESS	SUBJECT(S) OF INFORMATION
14.	Sarah Catalano Account Manager Regional Mortgage Programs, Inc. 1370 Plainfield Street Cranston, RI 02920 T: (401) 275-0600	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
15.	Michelle Nilon Account Executive Regional Mortgage Programs, Inc. 1370 Plainfield Street Cranston, RI 02920 T: (401) 275-0600	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.
16.	Keeper of Records Regional Mortgage Programs, Inc. 1370 Plainfield Street Cranston, RI 02920 T: (401) 275-0600	Knowledge of the payment history relative to the Plaintiff's loan, payments that the holder of the loan/servicer of the loan made on behalf of the Property, and MPIUA's decision not to insure Property.

B. DOCUMENTS, DATA COMPILATIONS, & TANGIBLE THINGS

Excluding those documents, data compilations, and tangible things that may be used solely for purposes of impeachment, the following categories of such items, are in the possession, custody, or control of the Defendants:

- Loan origination file, containing all mortgage loan origination documents, memoranda, and correspondence pertaining to this matter.
- Loan servicing file, containing all documents, memoranda, and correspondence pertaining to this matter.

The Defendants provide this disclosure without waiving any privilege, including, but not limited to, any attorney-client privilege or work product privilege. The documents constituting the loan servicing file and loan originating file are located at the Defendants' principal place of business. The Defendants reserve the right to supplement this response.

C. COMPUTATION OF SET-OFF AMOUNTS

N/A

D. INSURANCE INFORMATION

The Defendants are not aware of any insurance agreement or policy that might cover any potential liability in this matter. The Defendants reserve the right to supplement this response.

Respectfully submitted,

OCWEN FEDERAL BANK FSB and
OCWEN FINANCIAL CORPORATION

By their attorneys,



Paul Michienzie, Esq. – BBO #548701
Christopher Matheson, Esq. – BBO #640594
Michienzie & Sawin LLC
745 Boylston Street, 5th Floor
Boston, MA 02116
Tel. (617) 227-5660

Date: November 12, 2004